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September 20, 2022

Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Kara Sternquist
22 MJ 1005 (RLM)

Dear Judge Mann:

Our office represented defendant Kara Sternquist (“Sternquist”) at her presentment before the Court September 15, 2022. During the presentment, defendant requested a detention hearing which the Court scheduled for September 21, 2022 at 11:00 am. Sternquist has been unable to assemble a bail package to date. As a result, she respectfully requests that her detention hearing be adjourned to a date that she will apply for upon obtaining a bail package.

Our firm also respectfully requests that we be relieved as counsel and Sternquist be assigned counsel pursuant to the Criminal Justice Act. Her family and friends have informed us that there are no resources available to defendant to retain private counsel. Because defendant is in the initial intake process at the Metropolitan Detention Center, Covid protocols have prevented counsel visits. Otherwise, a CJA-20 form would have been prepared as part of this application.

Thank you for Your Honor’s consideration of these requests.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Andres Palacio (by ECF)
AUSA Turner Buford (by ECF)